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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 UNITED STATES OF AMERICA,)	Case No. 19-CR-225-RS
14 Plaintiff,)	
15 v.)	STIPULATION AND PROPOSED ORDER TO
16 CHAD SUNDERLAND,)	CONTINUE STATUS CONFERENCE AND SET
17 Defendant.)	CHANGE OF PLEA HEARING AND TO
)	EXCLUDE TIME UNDER THE SPEEDY TRIAL
)	ACT

18
19 On September 26, 2019, pursuant to a stipulation by the parties, the Court set a status conference
20 in the above-captioned case for November 5, 2019. The parties now stipulate and respectfully request
21 that the status conference be continued to November 19, 2019, at 2:30 p.m., and be set as a Change of
22 Plea Hearing. The parties request this continuance for accommodate defense counsel's schedule and for
23 the parties to finalize a pretrial resolution in this case.

24 The parties further agree and jointly request that the time between November 5, 2019, and
25 November 19, 2019, should be excluded under the Speedy Trial Act to provide reasonable time
26 necessary for effective preparation of counsel, and to continue their productive negotiations regarding a
27 pretrial resolution, pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv). The parties agree that the ends of justice
28 are served by granting the continuance and outweigh the interests of the public and the defendant in a

1 speedy trial.

2 **IT IS SO STIPULATED.**

3
4 DAVID L. ANDERSON
5 United States Attorney

6 Dated: November 1, 2019

7 /s/
8 BRIGGS MATHESON
9 Assistant United States Attorney

10 Dated: November 1, 2019

11 /s/
12 ANN MCGLENON
13 Counsel for Defendant CHAD SUNDERLAND
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~~[PROPOSED]~~ ORDER

Based on the reasons provided in the stipulation of the parties above, and for good cause shown, the Court hereby ORDERS that the status conference in the above-captioned matter is continued to November 19, 2019, at 2:30 p.m., for a Change of Plea Hearing. The Court further ORDERS that the exclusion of time from November 5, 2019, to November 19, 2019 (inclusive), is warranted and that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §§ 3161(h)(7)(A). The failure to grant the requested continuance would deny defendant effective preparation of counsel. 18 U.S.C. §§ 3161(h)(7)(B)(iv).

IT IS SO ORDERED.

Dated: 11/4/19



HON. RICHARD SEEBORG
United States District Judge